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RICHARD W. NAGEL
UNITED STATES DISTRICT COURT CLERK OF COURT
SOUTHERN DISTRICT OF OHIO 2018 OCT 25 PM 3: 45
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

VS.

TIMOTHY STANFIELD

Defendant.

U.S. DISTRICT COURT SOUTHERN DIST, OHIO CASE NO. FAST BLY, COLUMBUS

JUDGE

2:18 cr

225

INFORMATION

Judge Graham

18 U.S.C. § 542

18 U.S.C. § 1716

49 U. S. C. § 5124(c)

18 U. S. C. § 1956(a)(1)(A)(i)

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1 (Entry of Goods by Means of False Statements)

On or about November 26, 2014, in the Southern District of Ohio, the defendant,

TIMOTHY STANFIELD, willfully and knowingly did enter and introduce, and attempt to
enter and introduce, into the commerce of the United States, imported merchandise, that is
approximately 300 RMRC 8000 mAh 4S Lipo Batteries and 200 RMRC 12400 mAh 6S Lipo
Batteries by means of a false and fraudulent declaration, which falsely and fraudulently stated
that the package to which it was annexed contained approximately 4,007 individual LithiumPolymer batteries for toys valued at \$19,827, whereas, in truth and fact, as defendant,

TIMOTHY STANFIELD, well knew, the said package contained approximately 300 RMRC
8000 mAh 4S Lipo Batteries and 200 RMRC 12400 mAh 6S Lipo Batteries of an approximate
domestic value of \$120,436.

In violation of 18 U.S.C. § 542.

COUNT 2 (Mailing Injurious Articles)

On or about January 21, 2015, in the Southern District of Ohio and elsewhere, the defendant, TIMOTHY STANFIELD, did knowingly and unlawfully cause to be delivered by mail, according to the direction thereon, to TIM STANFIELD/READY MADE RC, LLC at 7719 Graphics Way, Suite F, Lewis Center, Ohio 43035, non-mailable material, to wit, a quantity of batteries in excess of that allowable by the United States Postal Service shipping regulations and 49 C.F.R. § 173.185.

Namely, the defendant, **TIMOTHY STANFIELD**, caused four (4) lithium polymer batteries to be mailed.

In violation of 18 U.S.C. § 1716.

COUNT 3 (Transportation of Hazardous Materials)

From on or about January 24, 2012, through on or about February 11, 2015, in the Southern District of Ohio, the defendant, **TIMOTHY STANFIELD**, knowingly altered, removed, destroyed, and tampered with a marking label, placard or description on a document required by Title 49, United States Code, section 5104(b) and Title 49, Code of Federal Regulations, section 172.101.

In violation of 49 U.S.C. § 5124(c).

COUNT 4 (Money Laundering)

On or about January 16, 2015, in the Southern District of Ohio, and elsewhere, the defendant, **TIMOTHY STANFIELD**, did knowingly conduct and attempt to conduct a financial

transaction affecting interstate and foreign commerce, to wit, the wire transfer of \$72,436 from READY MADE RC, LLC's JPMorgan Chase bank account ending x9260 to Kypom Technology Stock Co LTD's bank account ending in x838 knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and which property was, in fact, the proceeds of a specified unlawful activity, that is, the entry of goods by means of a false statement, in violation of 18 U.S.C. § 542, with the intent to promote the carrying on of said specified unlawful activity.

In violation of 18 U.S.C. § 1956(a)(1)(A)(i).

BENJAMIN C. GLASSMAN UNITED STATES ATTORNEY

Essica W. Knight

JESSICA W. KNIGHT, (0086615) J. MICHAEL MAROUS (0015322) Assistant United States Attorney